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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MELVIN HARRIS,

Defendant.

Case No.: 2:19-cr-202-APG-NJK

**Motion for Extension of Time to  
Respond to Defendant's Letter, Motion  
to Vacate and Motion to Reduce  
Sentence [ECF No. 59]**

CERTIFICATION: This motion is timely.

The government respectfully moves the Court for an extension of time to respond to defendant Melvin Harris' motions to amend his sentence and to reduce his sentence, and his letter requesting that the Court order the Federal Bureau of Prisons adjust his credit for time served. ECF No. 59. On July 12, the Court ordered the government to respond to these motions by July 21, 2023. ECF No. 61. The government respectfully requests a 14 day extension of time to respond, until and including August 4, 2023, for the reasons set forth below.

Harris's requests for relief are centrally premised upon an allegation that he was told that, if he pleaded guilty, he would be released in seven months. ECF No. 59 at 1. Harris asserts that his allegation is borne out by the transcript of his sentencing. *Id.* In order to

1 properly respond to Harris' motion, the government will need to review the transcripts of  
2 Harris' plea colloquy and sentencing, which have not been prepared. The government has  
3 ordered those transcripts on an expedited basis, but understands that their preparation may  
4 take some time. The government therefore respectfully requests a 14 day extension of time to  
5 respond to the motions.

6 DATED this 8th day of May, 2023

7 Respectfully submitted,

8 JASON M. FRIERSON  
9 United States Attorney

10 /s/ Peter H. Walkingshaw  
11 PETER H. Walkingshaw  
12 Assistant United States Attorney  
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16 IT IS SO ORDERED:

17 Dated: July 17, 2023

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19 ANDREW P. GORDON  
20 UNITED STATES DISTRICT JUDGE  
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